

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MELISSA MCFADDEN,

Plaintiff,

v.

CITY OF COLUMBUS,

Defendant.

Case No. 2:18-cv-544

Judge Edmund A. Sargus, Jr.

Magistrate Judge Jolson

**DEFENDANT'S PROPOSED
VOIR DIRE QUESTIONS**

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1. Knowing the subject of this case, is there anyone who is uncomfortable sitting on this jury?
 2. Knowing the subject of this case, is there anyone who really wants to sit on this jury?
 3. Have you, or has anyone close to you, ever been discriminated against or retaliated against, either in the workplace or anywhere else?
 4. Have you, or has anyone close to you, ever been accused of discrimination or retaliation, either in the workplace or anywhere else?
 5. Have you ever been involved in an investigation into claims of discrimination or retaliation?
 6. Have you, or has anyone close to you, ever been involved in a discrimination or retaliation lawsuit?
 7. Have you, or has anyone close to you, ever sued an employer or former employer?
 8. Has your employer ever been sued by someone who was alleging discrimination or retaliation?
 9. If you own or ever have owned a business or been self-employed, were you ever sued by someone who was alleging discrimination or retaliation?
 10. Have you, or has anyone close to you, ever been involved in an Equal Employment Opportunity Commission or the Civil Rights Commission case?
 11. Have you, or has anyone close to you, ever filed a worker's compensation claim?
 12. How much respect do you have for the police in your community?

13. Have you had any interactions with the Columbus Division of Police?
14. How much respect do you have for the Columbus Division of Police?
15. Have you, or has anyone close to you, ever been mistreated by the police?
16. Do you believe that Black people are generally treated less fairly than White people when dealing with the police?
17. Have you taken any steps in response to policing issues (such as protesting, or posting on social media, or putting up yard signs)?
18. Have you used any derogatory terms when referring to the police (such as Pigs, ACAB—All Cops are Bastards, Fuck the Police, Fuck 12).
19. Do you support defunding the police?
20. Do you support abolishing the police?
21. Are you a participant in any social justice or civil rights movements or organizations (such as the People's Justice Project or Showing Up For Racial Justice)?

Respectfully Submitted,

/s/ Paul M. Bernhart

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Susan E. Williams (0073375)

Paul M. Bernhart (0079543)

Assistant City Attorneys

CITY OF COLUMBUS, DEPARTMENT OF LAW

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2022, I electronically filed the foregoing with the Clerk of the Court by using this Court's CM/ECF system, which will send a notice of this electronic filing to all counsel of record in this matter.

/s/ Paul M. Bernhart

Paul M. Bernhart (0079543)